



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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January 18, 2022

**BY ECF**

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Joseph Srour v. City of New York, et. al.,  
22-CV-0003 (JPC)

Your Honor:

I am the Assistant Corporation Counsel assigned to represent defendants City of New York and New York City Police Department ("NYPD") Commissioner Keechant Sewell in the above-referenced matter. I write to respectfully request that defendants be granted a 30-day enlargement of time, from January 24, 2022 until February 23, 2022, to answer or otherwise respond to the complaint. This application is made with the consent of plaintiff's attorney. This is defendants' first application for an extension of time to respond to the complaint.

Briefly, plaintiff challenges Title 38, Chapters 3 and 5 of the Rules of the City of New York ("RCNY") regarding rifle and shotgun licenses in the City and handgun licenses in the City, respectively, and Title 10, § 302.2 and § 310 of the New York City Administrative Code ("Administrative Code") regarding liability for firearms dealers and manufacturers for firearm death or injury under certain circumstances. Plaintiff argues that the challenged provisions violate the Second Amendment on their face and as applied to plaintiff, and are preempted by New York State Law. Plaintiff alleges that he applied for, and was denied, a rifle and shotgun license and a handgun license.

It appears that the defendants were served with process on or about January 3, 2022. In accordance with this Office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need this additional time to investigate the allegations of the complaint. To that end, defendants are reviewing plaintiff's claims and the records related to the plaintiff's applications for both rifle and shotgun and handgun licenses. However, defendants require additional time to gather the relevant documents, investigate, and thoroughly respond to the complaint.

Accordingly, defendants respectfully request an enlargement of time, until February 23, 2022, to answer or otherwise respond to the complaint.

I thank the Court for its consideration of this request.

Respectfully submitted,

/S  
Aimee K. Lulich  
Senior Counsel

cc: Amy Bellantoni, Esq. (By ECF)